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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 CRYSTAL TORNO (A.K.A. CRYSTAL A.
16 THOMAS-BOLDUC), individually and
17 behalf of all others similarly situated,

18 Plaintiff,
19 vs.

20 GREEN TREE SERVICING, LLC, a
21 Delaware limited liability company;
22 NATIONAL DEFAULT SERVICING
23 CORPORATION, an Arizona Corporation;
24 and FEDERAL NATIONAL MORTGAGE
25 ASSOCIATION, a United States
Government-Sponsored Enterprise,

26 Defendants.

27 Case No.: 2:15-cv-01018-APG-PAL

28 **STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(First Request)**

Pursuant to LR 7-1 and LR 26-4, Plaintiff Crystal Torno and Defendants Green Tree Servicing, LLC and Federal National Mortgage Association (collectively the "Parties"), by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case by thirty (30) days. The current close of discovery is Monday January 22, 2018, and the Parties seek an extension up to and including Thursday February 22, 2018. In support of this Stipulation, the Parties state as follows.

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A. DISCOVERY COMPLETED TO DATE

1. Defendants will be serving written discovery on Plaintiff on or about Tuesday December 12, 2017.
 2. Plaintiff has noticed Green Tree's Rule 30(b)(6) deposition for Monday January 15, 2018.
 3. Plaintiff has noticed Fannie Mae's Rule 30(b)(6) deposition for Tuesday January 16, 2018.
 4. Defendants have noticed Plaintiff's deposition for Thursday January 18, 2018.
 5. The Parties have engaged in substantial settlement discussions, and continue to do so.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

1. The parties have scheduled depositions for the following entities/individuals on the following dates:
 - a. January 15, 2018: Ditech Financial
 - b. January 16, 2018: Federal National Mortgage Association
 - c. January 18, 2018: Crystal Torno
 2. Respond to written discovery.

C. REASONS WHY REMAINING DISCOVERY WAS NOT COMPLETED

The Parties have been working diligently to attempt resolution of this action. Additionally, the Parties have been proceeding with discovery as necessary to meet the current deadlines. However, with the upcoming holidays, the requirement to prepare for and conduct three depositions in early January, and the likely need to travel for the depositions of Defendants' Rule 30(b)(6) depositions, the Parties request a brief thirty day extension to finalize discovery. Additionally, the parties continue to engage in settlement discussions, and extending the discovery deadline would allow additional time for those efforts. This is the parties' first request to extend the discovery period and is not being made for purposes of delay.

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1 **D. PROPOSED SCHEDULE**

2 <u>Event</u>	3 <u>Current Deadline</u>	4 <u>Proposed New Deadline</u>
5 Close of Discovery	6 January 22, 2018	7 February 22, 2017

8 **IT IS SO STIPULATED.**

9 December 11, 2017.

10 SNELL & WILMER L.L.P. 11 By: <u>/s/ Robin E. Perkins</u> 12 Amy F. Sorenson, Esq. 13 Robin E Perkins, Esq. 14 V.R. Bonham, Esq. 15 3883 Howard Hughes Pkwy, Suite 1100 16 Las Vegas, NV 89169 17 Attorneys for Defendants Green Tree Servicing, LLC, and Federal National Mortgage Association	18 BAILEY KENNEDY 19 By: <u>/s/ Paul C. Williams</u> 20 Paul C. Williams, Esq. 21 8984 Spanish Ridge Avenue 22 Las Vegas, NV 89148-1302 23 Attorneys for Plaintiff Crystal Torno
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ORDER

IT IS SO ORDERED, pursuant to the Parties' Stipulation and Order to Extend Discovery Deadline (First Request), the close of discovery is extended to Thursday February 22, 2018.

DATED: December 15, 2017

Terry A. Tees
UNITED STATES MAGISTRATE JUDGE

4816-3059-2344

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